

Environmental Protection Agency
Navy Semi-Annual BRAC Report
April 1, 2016 – September 30, 2016

ALAMEDA NAVAL AIR STATION (NAS), CA

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I. Significant Issues:

- a. Congressional: None.
- b. High Profile Items: None.
- c. Delays in Environmental Restoration Actions: None.

II. Issues Impacting Transfer: None.

III. Staffing/Funding Issues: None.

IV. MOU Support Updates:

EPA reviewed and provided comments on 25 Navy documents, including one Record of Decision, one Remedial Action Completion Report, and one Basewide Five-Year Review.

EPA also reviewed and provided comments on City of Alameda Soil Management Plan Phases 1 and 2 Transfers Portion of Alameda.

EPA continued to regularly meet with the BCT and the City of Alameda on critical cleanup and reuse issues.

HUNTERS POINT NAVAL SHIPYARD, CA

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I. Significant Issues:

- a. Congressional: Superfund Division Director Enrique Manzanilla briefed Congresswoman Pelosi's Chief of Staff Robert Edmonson September 30, 2016, at his request about delay of transfer to resolve Tetra Tech falsifying of radiation samples. In early FY17, on November 3, the EPA, Navy, and State Department of Toxic Substances Control (DTSC) met with Edmonson, the Mayor of San Francisco, and Supervisor Malia Cohen about this issue. The Navy committed to hire a third party independent contractor to evaluate the prior work and make recommendations for future action to resolve this issue, probably including sampling.
- b. High Profile Items: After the Navy completed cleanup of Parcel G for industrial use, the City and County of San Francisco proposed to switch to residential use without further cleanup. EPA agreed to the proposal for partial modification of land use in locations based on a thorough technical evaluation of the latest soil conditions and the latest health-based cleanup criteria. EPA is also requiring a robust community involvement process for full transparency. A public meeting about this plan is scheduled December 7, 2016. The Nuclear Regulatory Commission concluded an enforcement action in October, 2016, against Tetra Tech ECI for intentionally falsifying samples at this site in its removal of storm drains and sewer lines to remove potential radiological contamination. Greenaction questioned the release criteria for radiological contamination and held a community meeting April, 2016, where Dan Hirsch, UC Santa Cruz, presented. Subsequently, reporters have made numerous inquiries about his allegations.
- c. Delays in Environmental Restoration Actions: In Parcel C, one contractor went bankrupt, so work was suspended, but it will resume soon with a new contractor.

II. Issues Impacting Transfer:

See above regarding Tetra Tech. On September 13, 2016, the EPA and DTSC wrote a joint letter to the Navy to confirm a verbal agreement that no properties would transfer until resolving the cloud of uncertainty regarding the site conditions due to Tetra Tech's confirmed pattern of falsifying samples. EPA, DTSC, and the Regional Water Quality Control Board wrote to the Navy that IR-10 in Parcel B-1 was not appropriate for transfer because of unexpected Trichloroethylene (TCE) levels in soil gas. The agencies came to agreement to carve out a new parcel in this location that will not be transferred until this

issue is resolved. EPA is participating in developing the Risk Management Plan and other documents associated with the transfers in Parcels B-1 and G and in IR-7/18. At Parcel G, EPA has required a thorough analysis of metal and SVOC concentrations in soil to determine which portions may be suitable for residential use. See above for Parcel G residential use.

III. Staffing/Funding Issues:

The Navy promoted Danielle Janda to be the new lead Remedial Project Manager. As more workplans from the developer come in for buildings, the EPA was negotiating a funding agreement with the developer to reimburse expenses for reviews, but these negotiations fell through. In addition the Mayor asked for speedy completion of the investigation into Tetra Tech's falsifying of data, which will require staff time to review the Navy's proposed workplans and monitor sampling. EPA may need additional resources for analyzing split or duplicate samples. EPA's ability to keep up with some activities may be hampered. Region 9 appreciates the incredibly helpful technical assistance of ERT health physicists David Kappelman and Lyndsey Nguyen.

IV. MOU Support Updates:

EPA continues to work closely with the Navy, the State, the City and its developer concerning the transfer process.

Remediation of B-1 was expected to be completed in mid-2015, but additional work will be needed to address unexpected TCE soil gas levels under a building. Final Remedial Action (RA) work in Parcel B-2 is 90% complete, but the Navy discovered unexpected high levels of mercury in groundwater at IR-26 in July 2015. The Navy delayed work in the ROD-required injection of metal immobilizers while it proposed a Trident study to potentially disprove that mercury is entering San Francisco Bay at unacceptable levels. The EPA and other agencies raised technical and legal questions regarding that proposal. On October 14, the Navy announced it is moving forward with a workplan for the treatment.

Final RA work on Parcel C continued. Durable covers are nearly complete. Revisions to the Remedial Action Work Plan for treatment of Volatile Organic Compounds (VOC's) in soil and groundwater are underway.

On Parcel E, the Navy completed pre-design investigation for methane, preliminary drainage design, and oily waste ponds characterization. Remedial Design drafting is underway and the draft version is expected in November 2016.

Parcel E-2 hot spot excavation a new Slurry wall are completed. Field work began November, 2016, on the next phase for installing another slurry wall and final cover on the landfill.

In Parcel F, the Navy began in June 2015 a pilot test for activated carbon to address Polychlorinated Biphenyl (PCB) contamination in sediment. 95% of test clams died, potentially due to temperature differences between the laboratory and the San Francisco Bay. The Navy placed new clams in the pilot location, which are doing much better, and monitoring events will continue through February 2017.